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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
11

12 REZA RAE POURIAN,
13 Plaintiff,

14 v.

15 UNITED STATES OF AMERICA,
16 Defendant.

Case No.: 3:18-cv-04536-RS
3:18-cv-04537-RS
**STIPULATION AND ORDER TO
CONTINUE FURTHER CASE
MANAGEMENT CONFERENCE
AS MODIFIED BY THE COURT**

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18 Plaintiff Reza Rae Pourian and Defendant the United States of America, through their
19 respective undersigned counsel of record, stipulate as follows and respectfully request an order
20 pursuant to this stipulation for a continuance of the case management conference currently set for
21 November 21, 2019, and of the pretrial motion deadline.

22 1. Plaintiff Reza Rae Pourian filed his Complaint in this matter on July 26, 2018, seeking
23 a refund of \$134,529, plus interest, based on an alleged overpayment of federal income tax for tax
24 year 2011. (Docket No. 1).

25 2. The United States timely answered on October 2, 2018, and filed an Amended Answer
26 on May 30, 2019. (Docket Nos. 16, 29).

27 3. The Court conducted an initial case management conference on November 15, 2018.
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1 Subsequently, the Court issued its Case Management Scheduling Order which set a Further Case
2 Management Conference for June 20, 2019, at 10:00 a.m. (Docket No. 25). That date was continued
3 to August 22, 2019, at 10:00 a.m., per the stipulation of the parties and the Court's approval. (Docket
4 Nos. 27, 28). That date was further continued to September 26, 2019, at 10:00 a.m., per the stipulation
5 of the parties and the Court's Order. (Docket Nos. 31, 32). In addition to continuing the case
6 management conference, the Court also allowed the parties more time for non- expert discovery and
7 continued the date by which pretrial motions must be heard to November 14, 2019. (Docket No. 32).
8 Per the stipulation of the parties, the Court again approved a continuance of the Further Case
9 Management Conference to November 21, 2019. (Docket Nos. 33, 34). The Court also continued the
10 date by which pretrial motions must be heard to December 19, 2019. (Docket No. 34)

11 4. Since the Court's Order, the parties have been engaged in informal discovery and have
12 been exploring resolution of the matter absent further involvement from the Court. At this time, the
13 parties are close to resolving the case.

14 5. To allow the parties additional time to pursue resolution discussions, the parties seek
15 to continue the Further Case Management Conference, currently set for November 21, 2019, for sixty
16 days. The Further Case Management Conference set for November 21, 2019 is continued to January
17 23, 2020 at 10:00 am. Case Management Statement due January 16, 2020.

18 6. The parties also request that the date for pretrial motions to be heard be continued to
19 February 20, 2020.

20 7. This is the parties' fourth stipulation for a continuance of the Further Case
21 Management Conference and third stipulation for a continuance of the pretrial motion deadline.
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1 Dated: November 14, 2019

BAKER BOTTS L.L.P.

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3 By: /s/ Jon Feldhammer
Jon Feldhammer (CA SBN 255031)

4 *Attorneys for REZA RAE POURIAN*

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6 Dated: November 14, 2019

RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General

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8 By: /s/ Amy Matchison
Amy Matchison (CA SBN 217022)
Trial Attorney, Tax Division
United States Department of Justice

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10 *Attorneys for UNITED STATES OF AMERICA*

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IT IS SO ORDERED.

Dated: 11/15/19



RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE